1 THE HONORABLE THOMAS S. ZILLY 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 7 PROJECT VERITAS, No. 2:21-cv-01326-TSZ 8 Plaintiff. PLAINTIFF PROJECT VERITAS' 9 NOTICE REGARDING RULE 26(f) v. **CONFERENCE** 10 THE LELAND STANFORD JUNIOR UNIVERSITY, and THE UNIVERSITY OF 11 WASHINGTON 12 Defendants. 13 14

This Court directed the parties to hold a Rule 26(f) Conference by Friday, January 14, 2022. [See Dkt. 13 at 1; Dkt Entry Nov. 16, 2021.] The Court has not amended this requirement or granted a stay of any discovery obligations in this case. Plaintiff understands that the Court's discovery obligations remain in full force and effect and, therefore, has attempted to comply with them by asking Defendants to participate in a Rule 26(f) conference on multiple occasions. [See Dkt. 32, Ex. 1, at 10–11]; (Email from Elizabeth M. Locke, Plaintiff's Counsel, to Defendants' Counsel (Jan. 13, 2022) (Ex. A)). Defendants, however, have refused to participate in a Rule 26(f) conference, asserting they are not bound by this Court's scheduling orders due to their reliance upon a state procedural statute. [See Dkt. 32 at 3; Dkt. 32, Ex. 3, at 17; Dkt. 32, Ex. 5, at 24.] Accordingly, no Rule 26(f) Conference has taken place. Plaintiff stands ready to participate in the Rule 26(f) Conference and to comply with all other deadlines set by this Court and/or the Federal Rules of Civil Procedure.

Plaintiff's Notice Re: Rule 26(f) Conference —

No. 2:21-cv-01326-TSZ

15

16

17

18

19

20

21

22

23

24

25

26

27

Project Veritas v. Stanford and Washington University

1 Dated: January 17, 2022 Respectfully Submitted, 2 3 4 Joel B. Ard, WSBA # 40104 Ard Law Group PLLC P.O. Box 11633 5 Bainbridge Island, WA 98110 6 Phone: (206) 701-9243 7 Elizabeth M. Locke, P.C. (of counsel) (pro hac vice) Andrew C. Phillips (of counsel) (pro hac vice) 8 CLARE LOCKE LLP 10 Prince Street 9 Alexandria, VA 22314 Telephone: (202) 628-7400 10 Email: libby@clarelocke.com Email: andy@clarelocke.com 11 ATTORNEYS FOR PLAINTIFF 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

Plaintiff's Notice Re: Rule 26(f) Conference — No. 2:21-cv-01326-TSZ